

Mid Sussex District Council
c/o Mr Stefan Galyas
By email to stefan.galyas@midsussex.gov.uk

13th October 2025

Re: Application DM/25/1968 for Use of a (C3) dwelling, namely 1 Lucas Way, Haywards Heath, RH16 1JR, as a children's home for a maximum of 3 children with up to three carers, two sleeping overnight working on a rota basis.

You have invited further representations from members of the public with respect to this application (referred to here as the "Application/Applicant") in response to the further information ("Further Information") presented by the Applicant, that being:

- a heavily redacted email from the Applicant to MSDC dated 26th September 2025
- a document titled Statement of Purpose dated 22nd September

In view of the Further Information, we have revisited the points we made in our letter of representation dated 3rd September 2025, and address these in turn below.

1. Potential Absence of Ownership Certificate

We have been assured by MSDC that the Ownership requirements have been satisfied.

2. The development is contrary to MSDC Planning Policy DP35.

The Applicant seems to be maintaining the position that the children's home would not involve a change in use from the historical use of 1 Lucas Way as a dwellinghouse and therefore that the Application does not constitute a 'development'.

However, we believe that the Applicant's position is at odds with legal precedent (North Devon case) and that the use of 1 Lucas Way as a children's home would constitute a development.

As a development, the Application is subject to MSDC Planning Policies including DP35, which, in the context of the Lucastes Conservation Area, requires applicants to demonstrate how their applications 'preserve or enhance' the character of that conservation area.

The Applicant has failed to address this requirement.

3. There is insufficient evidence provided with respect to the existing use to support the claim that there will not be material change resulting from the proposed change of use.

There is still no detailed description of the characteristics of 1 Lucas Way and its neighbourhood, or how any of these have been taken into account in any assessment of change.

We believe therefore that the Application still fails to meet the requirements set by legal precedent through prior appeals.

4. There is insufficient evidence provided with respect to the proposed use to support the claim that there will not be material change resulting from the proposed change of use.

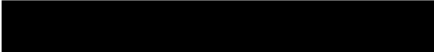
More details of the proposed use are provided in the Further Information. These (including OFSTED registration, management, professional oversight, procedures, staff rotas, clinicians, emergency admissions and company car) reinforce the institutional nature of the proposed use of 1 Lucas Way – and the materiality of change from its existing use.

However, there are other possible outcomes that have not been mentioned which would add to the impacts of the proposed development, increasing the materiality of the proposed change still further.

We believe, therefore, that the information provided still falls short of the standard set as legal precedent through prior appeals.

In summary, we do not believe that the Application should be granted

We would like to thank MSDC for giving us the opportunity to make these further representations.


27 Lucastes Road
Haywards Heath